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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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CLERK, U.S. DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA

DEPUTY

UNITED STATES OF AMERICA vs. Alan Howard LANE	Magistrate's Case No. '07 MJ 2521 COMPLAINT FOR VIOLATION OF 21 U.S.C. 952 and 960 Importation of a Controlled Substance

The undersigned complainant, being duly sworn, states:

COUNT ONE

That on or about October 28, 2007, within the Southern District of California, defendant Alan Howard LANE, did knowingly and intentionally import approximately 272.80 kilograms of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

And the complainant states that this complaint is based on the attached statement of probable cause, which is incorporated herein by reference.

Signature of Complainant
Enrique Martinez, Special Agent
Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence, this 29TH day of October 2007.

United States Magistrate Judge

WMC

United States of America

vs.

Alan Howard LANE

STATEMENT OF PROBABLE CAUSE

I, Special Agent ~~Molly Reeve,~~ declare under penalty of perjury the following is true and correct:
ENRIQUE MARTINEZ 10/29/07

On October 28, 2007, at approximately 1951 hours, Alan Howard LANE entered the United States from the Republic of Mexico at the San Ysidro Port of Entry, San Diego, California. LANE was the driver and sole occupant of a 2004 GMC Canyon bearing CAUS/8F73606. The truck was pulling an enclosed trailer bearing CAUS/4JG5178. Customs and Border Protection Officer (CBPO) Delgado was working primary inspections when LANE entered the U.S. When CBPO Delgado asked LANE to turn off the vehicle and hand over the keys, CBPO Delgado noticed that LANE's hand was shaking uncontrollably.

CBP Canine Enforcement Officer (CEO) Drivdahl responded to screen the vehicle with his Narcotic Detector Dog (NDD) Suza. NDD Suza alerted to the presence of a narcotic odor emanating from the front end of the trailer.

CBPO Cranford conducted a cursory inspection of the vehicles. Upon opening the door to the trailer, CBPO Cranford noticed a strong odor of bleach coming from inside the trailer. CBPO Cranford discovered cellophane wrapped packages behind a false wall at the front of the trailer.

CBPO Arias conducted a systematic inspection of the vehicle and discovered a total of twenty-one packages inside the false wall in the trailer. The packages contained a green leafy substance which field-tested positive for marijuana. The combined total weight of the packages was 272.80 kilograms.

Post-Miranda, LANE admitted he was being paid $1,000.00 to deliver the vehicle to San Diego, California. LANE stated that he knew the vehicle contained marijuana. LANE stated that he was to take the vehicle to the Wal-Mart off of Palm Ave in San Diego, California. LANE stated that he had driven loads of marijuana approximately twenty times previously. LANE stated that each time he would drive to the Wal-Mart on Palm Ave., and then drive the vehicle to somewhere North of Temecula, California.

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LANE was arrested and charged with violation of Title 21 USC 952, 960, Importation of a Controlled Substance.